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**From:** Pellegrini, Janet  
**Sent:** Thur 6/6/2013 9:39:44 PM  
**Subject:** Question re OH0144576 AEC data

Eric,

I wanted to call you prior to sending this email, but you may be out of the office by this time of day and I am out on sequestration furlough tomorrow, so am sending along so as not to delay any further.

NPDES has been reviewing the AEC OH0144576 permit data & issues and have hit a hurdle that we hope you may be able to assist us in resolving.

In analyzing ambient and effluent data for ponds 001 and 002 we have determined there is insufficient information to calculate water quality-based effluent limits for sulfate. First, as evidenced by a map supplied to us by the facility it appears that outfall 001 joins with outfall 018A before entering Piney Creek. We have no effluent data for 018A and cannot estimate the impact of that discharge on attaining water quality standards.

Additionally, how was flow determined, through measurements at existing non-controlled discharge points, or by calculating flow based on precipitation and catchment basin? If by precipitation, then explain specifics applied.

In addition, Piney Creek chloride and hardness values are given as 168 and 283 mg/L, respectively (from attachment 9 of the PDF file bennoc comments 091512.pdf), and sulfate values of 554 mg/L from page three of the same document. We cannot determine where the location is from which these data were obtained, although they are apparently OEPA data. Can you give us OEPA reference document or site source where this data was obtained? There is active mining and several outfalls nearby and upstream of outfalls 001 and 002. Unless the data were obtained immediately upstream of outfalls 001 and 002 and not influenced by any other discharge or mine runoff we do not believe they are representative of background conditions for the purpose of calculating effluent limits.

Thanks in advance for your time and consideration towards this matter.

If you have any questions regarding this, feel free to email me and I can respond upon my return to work on Monday.

Janet Pellegrini, Environmental Scientist

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